



Homeless Case Management Services Grant

Program Manual

Grant Year 2022/2023

State of Wisconsin

Department of Administration

**Division of Energy, Housing and
Community Resources**

Provides program rules and
guidance for the Homeless Case
Management Services Grant

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Chapter 1: General Information

1. Introduction

The Wisconsin Department of Administration's (DOA) Division of Energy, Housing, and Community Resources (DEHCR) developed this handbook as a resource for the Homeless Case Management Services Grant (HCMS) program. HCMS grantees are required to follow all state and federal requirements, policies, and procedures in this guide.

2. Program Overview

Each year up to 10 annual grants of \$50,000 each will be awarded through the HCMS grant. The HCMS grant has a narrow definition of who can be served and how they can be served. The grant is focused on providing families experiencing homelessness intensive case management including at least one (1) of the following areas:

- Financial management
- Employment
- Ensuring school continuation for children
- Enrolling unemployed or underemployed parents in W-2 or the Food Share employment and training program

HCMS grants are divided into two categories: program funds and administrative funds. Applicants can request up to 15% of their award be administrative funds but can also request less or none. The percentage allocation between program funds and administrative funds will be specified in each grantee's contract.

Eligible recipients are limited to shelter facilities, defined as temporary places of lodging for homeless individuals and families. Further, to be eligible applicants are required to use either the Homeless Management Information System (HMIS) database or a HMIS comparable database.

3. Background

Congress created the Temporary Assistance for Needy Families (TANF) block grant program through the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, as part of a federal effort to "end welfare as we know it." The Department of Health and Human Services awards block grants to states. The Department of Children and Families (DCF) provides funds from the TANF Block Grant the state receives, to the Department of Administration (DOA) to administer the HCMS grant program (§16.3085 of the Wisconsin Statutes, created by the Wisconsin Act 59 approved in 2017). All funding provided via the HCMS grant program is subject to TANF rules and regulations.

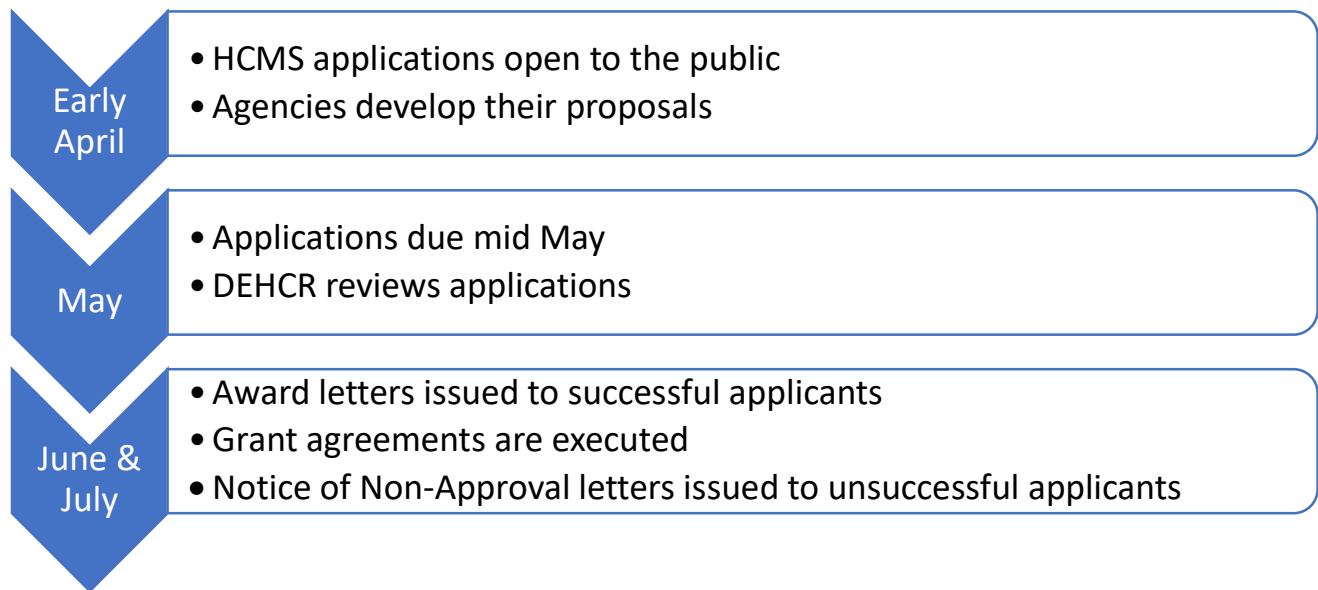
Chapter 2: Application Process

1. Eligible Applicants

Eligible applicants are limited to shelter facilities, defined as temporary places of lodging for homeless individuals and families. Further, to be eligible applicants are required to use either the HMIS database or an HMIS comparable database.

2. Application Timeline

The general HCMS application timeline is as follows and is subject to change:



3. Scoring

Applicant scoring will be based on their submitted application. The top applicants, based on the scoring criteria, will be awarded grants. A maximum of 10 grants of up to \$50,000 each will be awarded.

Chapter 3: Program Requirements

1. Client Eligibility

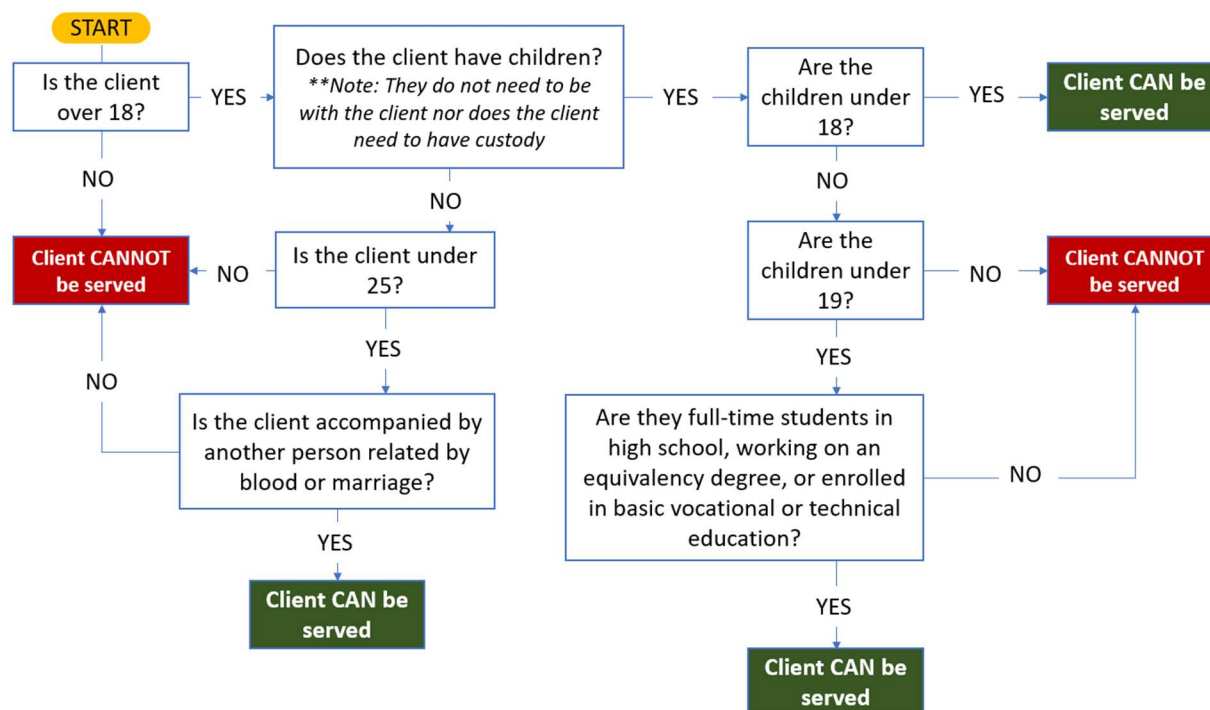
The HCMS grant has a narrow definition of who can be served. The grant is focused on providing families experiencing homelessness intensive case management. Families are defined by TANF regulation as:

1. Homeless adults (age 18 or older) accompanied by minor children (under age 18 for whom the homeless adults are legally responsible, or under 19 but a full-time student in high school, working on an equivalency degree, or enrolled in basic vocational or technical education); or
2. Homeless pregnant women; or
3. Homeless adults, unaccompanied by children, who are non-custodial parents of children under the age of 18; or
4. Homeless adults, unaccompanied by children, who are over age 18 but younger than age 25 and accompanied by another person related by blood or marriage.

***Under this definition they are not required to have children*

Please note, families headed by a person under 18 cannot be served. Preference is given to servicing the first two (2) types of families, however all families as defined above can be served.

Below is a visual flowchart of who can be served with the same information as above broken down into a series of questions to determine eligibility.



2. Client Applications & Pre-Screening

Client applications must be submitted in writing (either in-person or electronically) and must include all information required by the grantee to determine the client's eligibility. Grantees may develop application forms that meet their specific needs.

Grantees may choose to use a shorter pre-screen form to place potentially eligible applicants on a waiting list. If an applicant is selected from the waiting list, they must then complete the full application form, which must include new/updated information to be used to determine final eligibility at the client's point of entry into the HCMS program.

3. Waiting List Policy

The demand for assistance may be greater than available resources. Grantees may choose to use a waiting list. If a waiting list is used, the grantee must establish a written Waiting List Policy which defines how the waiting list is managed. The following is a non-exhaustive list of parameters grantees may use to organize their waiting lists:

- The order in which assistance is offered (i.e. preference selection policy based on aggregate needs, first come-first served, lottery, etc.);
- The length of time for utilizing the waiting list (i.e. maintaining the list for a fixed period of time, then starting over; accepting applications for a fixed period of time, then closing until all eligible applicants receive assistance; continuously accepting applications; etc.);
- The severity or intensity of each client's need

4. Client Denial

Every client who enters the shelter should be asked if they meet the eligibility requirements for the HCMS grant. If they do, they should be asked if they are interested in the HCMS program and given an application to fill out. Clients who fill out the application for the HCMS program and then are determined to be ineligible based on the information provided in the application must be notified in writing. The written notice must identify why the applicant is ineligible. It must also inform the client that they have ten (10) calendar days from the date of notice to request a review of the decision. Reviews must be requested in writing to the grantee.

If the client is put on the waiting list after filling out the application for the HCMS program, this does not trigger the need to issue a formal denial letter.

5. Overview of Eligible Activities & Reimbursable Costs

Each HCMS grant is divided into two categories: program funds and administrative funds.

1. Program Funds

Program funds can be used to pay for program costs directly tied to providing intensive case management to families including at least one (1) of the following areas:

- Financial management

- Employment
- Ensuring school continuation for children
- Enrolling unemployed or underemployed parents in W-2 or the Food Share employment and training program

Reimbursable cost could include, but are not limited to, case manager salaries (wages, benefits, etc.), or costs associated with providing financial management training and job training to clients. Please note, in order to be reimbursable these services must be actively provided to a client. Costs for staff to be on call to provide services are not eligible for reimbursement.

2. Administrative Funds

Administrative funds can pay for administrative costs such as, but not limited to, the cost of office space, computers, office supplies, and salaries for agency wide functions such as accounting. Please note these costs will need to be prorated to reflect the percentage of the staff person's time or the percentage of the resource that is dedicated to the HCMS program.

Applicants can request up to 15% of their award be administrative funds but can also request less or none. The percentage allocation between program funds and administrative funds will be specified in the grantee's contract.

6. Non-Reimbursable Costs

HCMS funds may not be spent on the following:

- Capital expenditures
- Alcoholic beverages
- Items that could be construed as entertainment, including social activities and tickets to movies, shows, sports events, or concerts, and any costs related to attending such events, whether or not admission is charged.

If it is found the grantee used grant funds for any of the above outlined non-reimbursable items/activities, the grantee will be required to refund the dollars used for the non-reimbursable items/activities.

Chapter 4: Administrative Requirements

1. Contractual Responsibility

Grantees must commit to providing the services mutually agreed upon in the contracts. Grantees may choose to provide all services directly or may sub-contract to another public, private, or non-profit organization.

The grantee must maintain primary responsibility for all contractual issues, however administrative duties and program delivery may be subcontracted out.

If the grantee decides to subtract, they must encumber all sub-recipients with the program delivery requirements outlined in the grantee's contract and program application. A grantee must also monitor their sub-recipient at least once during the contract to check for compliance. This monitoring must include a review of client files, procedures, policies and financials as outlined in Chapter 7: Annual Monitoring in this document. The grantee must also develop a payment process for disbursing HCMS payments in a timely manner (within thirty (30) days of receiving the payment from DEHCR) to the sub-recipient.

2. Contract Amendments

Grantees may amend their contracts only with written approval from DEHCR. To request a contract amendment, HCMS grantees are encouraged to consult with the HCMS Program Manager (Emily.Bourne@wisconsin.gov), then electronically submit:

- A written request defining and justifying the changes being made. The request must be signed by someone with contract signature authority (digital signatures are accepted);
- An amended budget if any changes are being made (Excel files preferred).

DEHCR must receive all contract amendment requests no later than thirty (30) days before the end of the contract period.

3. Homeless Management Information Systems or Comparable Database Requirements

As a condition of funding, grantees are required to use either the Homeless Management Information System (HMIS) database or an HMIS comparable database. They must also commit to participating in applicable trainings throughout the contract period. These databases are used to measure the scope of homelessness in Wisconsin, track service delivery and help evaluate the effectiveness of service interventions. Grantees will be required to provide quarterly and annual reports leveraging HMIS or an HMIS comparable database. See Chapter 6: Reporting for further information.

4. Coordinated Entry

Coordinated entry (CE) refers to a single place or process for people to access homelessness prevention, housing, and related services within a given Continuum of Care (CoC). HUD COCs are required to develop a system for CE. Grantees are encouraged to participate in coordinated entry but are not

required. Grantees may use any applicable coordinated entry procedures to evaluate client eligibility for the HCMS program.

5. Required Client File Elements

A client file must be created for each applicant who at minimum submits a pre-screen form regardless of whether the applicant is eventually accepted or denied. This file must contain the following elements:

- Intake Form, Initial Assessment and/or Application
- Documentation of Eligibility
- Documentation of Services Provided (if accepted into the program)
- If accepted into the program, Termination Procedure Receipt (as well as any correspondence related to a termination proceeding, if applicable)
- If not accepted into the program, Denial Letter
- Certification of Entry into HMIS or an HMIS Comparable Database

When sharing client files with DEHCR please redact all personally identifiable information such as the client's name, social security number, driver's license images, etc. Paper copies of social security cards, driver's licenses, other forms of personal identification should not be kept in the client file.

6. Practices, Policies, Procedures & Documentation

The following practices, policies, procedures and documentation of such are required of each grantee and may be reviewed during the application process and during yearly monitoring. In this section we provide a description of the required elements in each.

1. Signing Authority Documentation

Each grantee must have documentation naming the person or persons who have signing authority for their organization.

2. Process to Ensure Client Eligibility

All grantees must have a process in place to screen clients to ensure eligibility.

3. Accessibility Practices/Resources

Each grantee should have resources and practices in place to communicate with all potential beneficiaries including those with limited or no English. Further, facilities and programming should be accessible to people with disabilities including, but not limited to, people with vision loss, hearing loss, physical/mobility concerns, and learning disabilities.

4. Trauma-Informed Care Practices

Recognizing that most HCMS clients have experienced different types of trauma, each grantee is required to have trauma-informed care practices in place. Trauma-informed care practices are defined as an approach to intervention and providing services that focuses on how trauma may affect an individual's life and their response to receiving services in various systems. All grantees are expected to provide training to their staff on trauma-informed care practices.

5. Faith Based Activities

All HCMS-funded activities must be administered in a manner that is free from religious influences and in accordance with the following principles.

- Grantees must not discriminate against any employee or applicant for employment and must not limit employment or give preference in employment to persons based on religion.
- Grantees must not discriminate against any person applying for shelter or services and must not limit shelter or services or give preference to persons based on religion.
- Grantees must provide no religious instruction or counseling, conduct no religious worship or services, engage in no religious proselytizing and exert no other religious influence in the provision of programs or services funded under HCMS.
 - If a grantee conducts these activities, the activities must be offered separately in time or location from the programs or services funded under HCMS, and participation must be voluntary for HCMS program participants.

6. Involuntary Family Separation

The following rules apply to all grantees:

- All individuals or groups of individuals regardless of age, gender identification, sexual orientation, and marriage status identifying as a family must be served as a family by any project which serves families. There can be no involuntary separation.
- There can be no documentation requirement or need for “proof” of family, gender identification, and/or sexual orientation. Examples of prohibited inquiry and documentation include but are not limited to parentage, birth certificates, and marriage certificates.
- Families with children under age 18 must not be denied services based on the age of any child under age 18. For example, a family could not be denied assistance because there is a 16-year-old in the family.

7. Equity Advancement & Culturally Responsive Practices

Each grantee is expected to identify any differences between the population of BIPOC (Black, Indigenous, People of Color) in its service territory compared to the grantee’s clients. If there are differences, strategies should be defined to help close the gap and be more culturally responsive to the populations identified in the analysis.

Further, DEHCR will begin to monitor grantees, during the 2022/23 grant year, for policies and procedures to ensure equal access to services regardless of sexual orientation, gender identity, family composition or marital status. This is a new requirement and we want to give all grantees time to create these policies and procedures.

8. Client Termination Policy

To terminate assistance to a program participant, the grantee must establish and follow their formal process with the following requirements:

- Grantees must document the provision of the termination policy to the client.
- Grantees may terminate assistance if a participant violates the rules of the program.
- Grantees must establish and follow a formal process that recognizes individual rights.

- Grantees must allow termination in only the most severe cases.
- Grantees may provide assistance to a program participant who has been terminated from a program at a later date.

9. Confidentiality Policy

All grantees must develop and implement written confidentiality procedures to ensure:

- All records containing personally identifying information of any person or family who applies for and/or receives HCMS assistance will be kept secure and confidential.
- The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the HCMS grant will not be made public except with written authorization of the person responsible for the operation of the shelter.
- Grantees must develop and implement procedures to ensure the confidentiality of records pertaining to any person provided family violence prevention or treatment services under any project assisted under the HCMS program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

10. Conflict of Interest Policy

Grantees must have and comply with organizational, individual, and procurement conflict of interest policies.

Organizational Conflict of Interest

Grantees must not condition HCMS assistance on a client's acceptance of housing or another good or service owned by the grantee, a parent or subsidiary of the grantee.

Individual Conflict of Interest

The individual conflict of interest regulations prohibit financial gain for self, family, or those with business ties. No person who exercises responsibility over HCMS funded projects or who is in a position to participate in a decision-making process or gain inside information with regard to HCMS funded projects may:

- Obtain a financial interest or benefit from an assisted activity
- Have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity
- Benefit from an assisted activity, either for themselves or for those with whom they have family or business ties, during their tenure or during the one-year period following their tenure

Procurement Conflict of Interest

In the procurement of property and services, the conflict-of-interest provisions of 42 CFR §495.348 apply. These regulations require grantees to maintain written standards governing the performance of their employees engaged in awarding and administering contracts. At a minimum, these standards must:

- Require that no employee, officer, agent of the grantee shall participate in the selection, award, or administration of a contract supported by HCMS funds if their participation would create a real or apparent conflict of interest.
- Require that grantee employees, officers and agents not accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to sub agreements.
- Stipulate provisions for penalties, sanctions, or other disciplinary actions for violations of standards.

Any grantee who violates the above will be required to repay any HCMS funds disbursed for which there is an identified conflict of interest unless an exception is granted by DEHCR.

11. Non-Discrimination Policy for Clients & Employees

Each grantee must have a policy expressing discrimination against clients and employees based on based on race, color, religion, sex (including pregnancy, sexual orientation, or gender identity), national origin, physical condition, disability, age (40 or older) or genetic information (including family medical history) is illegal and will not be tolerated. The policy should outline a way for clients and employees to report discrimination, and potential repercussions.

12. Drug Free Workplace Policy

Each grantee is required to have a Drug Free Workplace Policy and procedures to carry out the policy. The policy must include that the contracting or granting agency (DEHCR) will be notified within 10 days after receiving notice that a covered employee (an employee supported with HCMS funds) has been convicted of a criminal drug violation in the workplace.

13. Anti-Lobbying Requirements

Each grantee is required to have a policy in place to ensure compliance with anti-lobbying requirements. HCMS funds may not be used to influence federal contracting or financial transactions.

14. Recordkeeping and Retention

Grantees must retain all program files and records (including client files) for a minimum of five (5) years after the contract period ends. All files must be available for review or audit upon request from DEHCR. Often the turnaround for file requests is short; therefore, files must be readily accessible so they can be provided to DEHCR within the timeframe requested.

Chapter 5: Financial Management

1. Tracking of Funds

All grantees must track each funding source from DEHCR separately. Each expenditure billed to the HCMS grant must have backup documentation that can be produced upon request. Payroll expenses should include documentation from timesheet to paycheck and should show allocation of hours by funding source. Please note, grantees are required to provide access to financial statements and expenditure records upon request by representatives of Department of Administration, Department of Children & Families or the Legislative Audit Bureau.

2. Indirect Cost Allocation

Indirect costs billed to the HCMS grant should follow standard accounting practices. Backup documentation supporting these costs should be able to be produced upon request.

3. Audit

DEHCR expects grantees to be regularly audited and will ask to see the most recent audit during monitoring. Please note that any grantee who is a non-Federal entity “that expends \$750,000 or more during the non-Federal entity’s fiscal year in Federal awards must have a single or program-specific audit conducted for that year...” per 2 CFR §200.501. The HCMS grant award by itself will not trigger this requirement, however when combined with all other Federal awards the grantee receives it may in combination trigger this requirement, if the combined Federal awards are equal or greater than \$750,000.

Chapter 6: Funds Disbursement & Quarterly Updates

Grantees may draw on HCMS funds as reimbursement of expenditures. To initiate each payment, grantees must complete and submit the HCMS Payment Request Form on or before the fifteenth (15th) of the month following the close of the quarter. Grantees are also allowed to submit monthly, on or before the fifteenth (15th) of the month for the previous month’s expenses. Please note submission of quarterly reporting is required before HCMS Payment Request Forms will be processed. If submitting monthly, reporting is due with submission of the Payment Request Form for the last month in the quarter’s expenses. DEHCR reserves the right to change this policy. Please see Chapter 6: Reporting for more information.

If grantees are not requesting payment, they are required to provide a short quarterly update stating when they expect to draw on HCMS funds and if they foresee any issues with spending the full amount awarded within the contract period. If they have entered clients into the HCMS program they will also be required to provide quarterly reporting with the update. Grantees will be expected to provide a quarterly update if not submitting a quarterly payment request until they have exhausted all funds. These updates are due on or before the fifteenth (15th) of each month following the close of the quarter.

Payment requests must be submitted by email to DOADEHCRFiscal@wisconsin.gov copying the HCMS Grant Specialist (Emily.Bourne@wisconsin.gov).

Spending updates and reporting should be sent to the HCMS Grant Specialist (Emily.Bourne@wisconsin.gov).

Grantees must submit final payment requests and reporting within 60 days of the performance period end date or termination of the contract whichever comes earlier.

Chapter 7: Reporting

Grantees are required to submit quarterly reporting to DEHCR which must be received on or before the fifteenth (15th) of the month following the close of the quarter. The reporting template will be provided once the contract is signed. Grantees will also be required to submit a grant year-end report. DEHCR reserves the right to require additional information or reports as needed. Below are the current required datapoints for each report.

1. Quarterly Reporting

Grantees must submit quarterly reports on the following services provided:

1. The number of households provided with intensive case management services
2. The number of households served by the grantee's shelter facility (whether or not they are in the HCMS program)
3. The number of individuals provided with intensive case management services
 - a. The number of adults (over 18)
 - b. The number of children under 18
 - c. The number of children under 19 (who meet the HCMS eligibility requirements)
4. The number of individuals served by the grantee's shelter facility (whether or not they are in the HCMS program)
5. The number of adults (over 18) with children under 18 that were served, whether or not the adult was accompanied by their children to the shelter, and whether or not the adult has custody of their children under 18
6. The number of households with children under 18 or children under 19 (who meet the HCMS eligibility requirements) who received services to ensure continuation of school enrollment for their children, or to promote regular school attendance
7. The number of children under 18 or children under 19 (who meet the HCMS eligibility requirements) who received services to ensure continuation of school enrollment for their children, or to promote regular school attendance
8. The number of households that were assisted to enroll in or referred to:
 - a. Wisconsin Works
 - b. Wisconsin Shares Child Care Subsidy
 - c. Food Share Employment and Training
 - d. Job Center of Wisconsin
 - e. The Division of Vocational Rehabilitation
 - f. Veterans Resource Officers

- g. In-house Job Training
- h. Other organizations/apprenticeship programs
- 9. The number of individuals who received other services.

Please note DEHCR reserves the right to change reporting requirements.

2. Yearly Reporting

Grantees must submit an annual report covering the entire contract period within 60 days of the performance period end date or termination of the contract whichever comes earlier. The report must include all the monthly reporting datapoints aggregated and unduplicated for the year, plus the following datapoints:

1. The number of adults with earned income:
 - a. At the start of the HCMS program
 - b. At an annual assessment (stayers) in the HCMS program
 - c. Upon exit from the HCMS program
2. The number of adults with any income:
 - a. At the start of the HCMS program
 - b. At an annual assessment (stayers) in the HCMS program
 - c. Upon exit from the HCMS program
3. The number of adults with no income:
 - a. At the start of the HCMS program
 - b. At an annual assessment (stayers) in the HCMS program
 - c. Upon exit from the HCMS program
4. The total number of adults:
 - a. At the start of the HCMS program
 - b. At an annual assessment (stayers) in the HCMS program
 - c. Upon exit from the HCMS program
5. The number of adults in each monthly cash income range (monthly ranges are: no income, \$1-\$150, \$151-\$250, \$251-\$500, \$501-\$1,000, \$1,001-\$1,500, \$1,501-\$2,000, \$2001+, client doesn't know/refused, data not collected, not yet required to have an annual assessment, required annual assessment has not been completed yet)
 - a. At the start of the HCMS program
 - b. At an annual assessment (stayers) in the HCMS program
 - c. Upon exit from the HCMS program

All of the above datapoints can be pulled in HMIS by running an APR (Annual Performance Report). Please note DEHCR reserves the right to change reporting requirements.

Chapter 8: Annual Monitoring

DEHCR will monitor the performance and requirements compliance of each grantee at least annually. During the monitoring grantees should expect DEHCR to ask to see all of the documentation as outlined

in Chapter 3: Program Requirements, Chapter 4: Administrative Requirements and in Chapter 5: Financial Management. DEHCR will also begin to monitor grantees for policies and procedures to ensure equal access to services regardless of sexual orientation, gender identity, family composition or marital status. This is a new requirement. If the grantee has sub-recipients, it is expected the grantee will monitor the sub-recipients in the same way DEHCR will monitor the grantee. The monitoring can be either onsite or a desk monitoring. DEHCR reserves the right to change the monitoring requirements.

Chapter 9: Resources

1. Questions?

Any questions regarding the application process or this grant can be directed to the HCMS Grant Specialist Emily.Bourne@Wisconsin.gov or to DOASupportiveHousing@wisconsin.gov.

2. Statues

Information on the WI Statue creating the HCMS grant program can be found at: [Wisconsin Legislature: 16.3085](#). Information on TANF can be found at: [Temporary Assistance for Needy Families \(TANF\) | The Administration for Children and Families \(hhs.gov\)](#).